

ORIGINAL

FILED IN OPEN COURT
U.S.D.C. - Atlanta

MAY 24 2022

KEVIN P. WEIMER, Clerk
By: *Cam* Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

JAMES WAN

Criminal Indictment

No. 1:22 CR 188

THE GRAND JURY CHARGES THAT:

From on or about April 18, 2022, through on or about May 12, 2022, in the Northern District of Georgia and elsewhere, the defendant, JAMES WAN, did knowingly use a facility of interstate commerce with the intent that the murder of an individual, "T.B.," be committed, in violation of Georgia law (O.C.G.A. § 16-5-1), as consideration for the receipt of, and as consideration for a promise and agreement to pay, something of pecuniary value, all in violation of Title 18, United States Code, Section 1958(a).

Forfeiture

Upon conviction of the offense alleged in this Indictment, the defendant, JAMES WAN, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, constituting or derived from proceeds traceable to the offense, including but not limited to: a money judgement; that is, a sum of money in United States currency representing the

amount of proceeds obtained as a result of the offense for which the defendant is convicted.

In addition, upon conviction of the offense alleged in this Indictment, the defendant, JAMES WAN, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense.

If, as a result of any act or omission of the defendant, any property subject to forfeiture:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

the United States intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the

forfeitable property or seek a money judgment against said defendant for any amount that would constitute the proceeds of such violation.

A TRUE BILL

Jeanelle Ecale
FOREPERSON

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